

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA

v.

RUSLANS BONDARS

Defendant.

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Case No. 1:16CR228

**DEFENDANT BONDARS FIRST NOTICE OF INTENT
TO OFFER EXPERT TESTIMONY**

Defendant Ruslans Bondars, pursuant to Federal Rule of Criminal Procedure 16(b)(1)(C) and the Discovery Order entered in this matter, hereby notifies the Court and counsel for the United States of his intent to offer at trial the testimony of Mr. Kevin Peden, Peden Digital Forensics, regarding computer and digital technology forensics.

Mr. Peden, through his education, training, and experience has amassed the requisite experience and particularized knowledge to testify regarding all issues surrounding forensic software, digital evidence and investigation, data extraction, data analysis, and computer forensics, in addition to all related computer and forensic evaluations thereof. A current copy of Mr. Peden's curriculum vitae was provided to counsel for the United States.

Mr. Peden's testimony will include, but may not be limited to, analysis as to all technical matters and assessments of the evidence that the Government provided through discovery.

Mr. Peden's testimony will include, but may not be limited to, computer and digital forensics. He will testify as to the analysis, meaning, and interpretation of the FBI's investigation and the examiners/analyst's forensic reports related to the computers,

servers, and program activity provided by the Government in this case.

Mr. Peden's testimony will include, but may not be limited to, his forensic examination and analysis of the service Mr. Bondars is alleged to have developed.

Mr. Bondars hereby reserves the right to call upon Mr. Peden for his expert testimony on issues pertaining to the Defense at trial and which may not be specifically enumerated herein.

Respectfully Submitted,

RUSLANS BONDARS
By Counsel
HARRIS CARMICHAEL & ELLIS, PLLC

/s/

Jessica N. Carmichael, Esq. VSB# 78339

Yancey Ellis, Esq. VSB# 70970

Counsel for Defendant,

108 N. Alfred Street, 1st Floor

Alexandria, Virginia 22314

(703) 684-7908

(703) 649-6360 (fax)

jcarmichael@harriscarmichael.com

yellis@harriscarmichael.com

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of April, 2018, I filed the foregoing pleading through the ECF system, which shall then send an electronic copy of this pleading to all parties in this action.

/s/
Jessica N. Carmichael